

ORIGINAL

MAY 29 2002

CLERK, U.S. DISTRICT COURT

By

Deputy

**In the United States District Court for the Northern District of Texas  
Dallas Division**

(USA and )

**Jamal Elhaj-Chehade**

**Co- plaintiff**

**Vs.**

**3:01-CV-01301-L**

**Educational Commission for Foreign Medical Graduates**

**(entities and individuals) defendants**

**Plaintiff's preliminary list of evidences and witnesses and motion**

**To admit**

**May 27, 2002**

Comes on this date the plaintiff is filing his motion to admit his (list) of evidences and witnesses as follow: Part of this list was previously submitted on April 2002

The plaintiff list include but not limited to the following

**Expert witness and evidences**

- 1-The plaintiff will use the Governmental or public records
- 2-The ECFMG defendants income Tax filings, the ECFMG publications and correspondences with the plaintiff or other persons
- 3-The defendants court records
- 4-The National resident Matching Program correspondences, printout, documents and publications
- 5-The defendants ECFMG website [www.ecfm.org](http://www.ecfm.org)
- 6- DR Badri Madani the owner of the website [www.ecfm.com](http://www.ecfm.com) and its content that resulted in the case ECFMG vs. Teknology Laine and Bradralsadat case USDC 6:99-1676-24 and this case
- 7-Personnel Of ECFMG/ Dennis Donohue, William Kelly, Dr Nancy Gary
- 8-Dr Edward Johnson and Dr Joshi , and other personnel at UTSW of UT Southwestern Medical center at Dallas?Parkland.
- 9-Ms Susan Schwartz, Barry Moscowics, Jason Kipness and other attorneys for ECFMG and for UTSW
- Others as they may become available
- 10-Mr John Killian Dallas
- 11-Court cases 3:99 CV-680-D and other proceedings against UTSW
- 12-Websites for UTSW and others
- 13-And correspondences in any form, between the plaintiff and other parties.
- 14- depositions in the cases against UTSW and ECFMG
- 15- the plaintiff will testify upon the nature of the defendants, their aims and missions, and duties and their practices, what constitute a plaintiff's need? And what the defendants other agenda?.

**Probable witness**

- 1-Dr Badri other website as <http://groups.yahoo.com/group/fmgs/message/2>

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- 2-Dr Daniel Klage, the founder of the website [www.maxpages.com/bestdoctors](http://www.maxpages.com/bestdoctors)
- 3-Judge Boyle will testify upon the circumstance she inherited the case 3:99-CV-680-D
- 4-AMA publications, directories. Journals, newspapers, websites
- 5- depositions that the plaintiff intends to take once the appointment of a counsel is granted.
- 6- others evidence and witness as they become available and citations
- 7- Mr Jerome Levy( if needed, the plaintiff told him so)
- 8- the plaintiff will use any case laws and citations and all the citations used in the previous cases and *schruber v. Allis Chalmers Corp.*, 611 F.2d , 790 , USCA-10, 1979.

**Plaintiff's preliminary statements:**

**The plaintiff will use under penalty of perjury, statements, photocopies that are true or original** where available. However the plaintiff will use mostly public or governmental record and publications done by the defendants where FRCP rules of evidence are simple, acceptable, as is and do not need authentication( defendants are the source and hold the original) or a government document accepted as is. Furthermore, the plaintiff is willing to authenticate anything the defendants ask provided they pay for it. The evidences or exhibits will be submitted as needed and as the matter progress along.

**Certificate of service and Conference:** this is to recertify that this motion is a re-filing of a previous list and it is aimed to admit the use of evidence at any time. the initial filing was done after the telephonic conference and notice of April 11, 2002 at 1303 Hour Dallas time between the plaintiff and the defendants attorney Mr Moscovics and with the defendants attorney via e-mail that a true copy of the foregoing was sent again to the defendants attorney Mrs. Susan Schwartz at 6688 N Central Expway # 850 Dallas Texas 75206-3913 on the day of Wednesday May 29, 2002 via USPS and e mail to the defendant attorneys.

Respectfully submitted to the Honorable Judge Sam Lindsey  
Plaintiff Dr Jamal Elhaj-Chehade, pro-se( at this time) and IFP  
5414 Cedar Springs# 806 Dallas, Texas 75235.  
Plaintiff's e mail [hevjam7@yahoo.com](mailto:hevjam7@yahoo.com)

